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8 ADRIANA VANESSA NUÑEZ

9
10 UNITED STATES DISTRICT COURT
11 FOR THE NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 GLORIA NUNEZ,

Case No. 3:16-cv-07412-JST

14 Plaintiff,

15 v.
16 STIPULATED REQUEST FOR A
17 21-DAY ENLARGEMENT OF TIME
COMPANY RETIREMENT PLAN,
18 TO FILE A FEE PETITION
(Dkt. 67, L.R. Civ. 6-3)

19 Defendant.

and

20 PACIFIC GAS AND ELECTRIC
21 COMPANY RETIREMENT PLAN,
22 Counterclaim/Interpleader-Plaintiff,
23 v.
24 GLORIA NUNEZ, and ADRIANA
25 VANESSA NUÑEZ,
26 Interpleader Defendants.

[proposed] ORDER

1 Pursuant to Civil Local Rule 6-3, the undersigned counsel for Interpleader
2 Defendant Adrianna Vanessa Nuñez, and Plaintiff and Interpleader Defendant Gloria
3 Nuñez, hereby stipulate and agree as follows:

4 (1) Pursuant to the Court's Order of February 12, 2018 (Dkt. 67), Interpleader
5 Defendant Adrianna Vanessa Nuñez must file a fee petition, if any, no later than March
6 5, 2018.

7 (2) The undersigned counsel for Interpleader Defendant Adrianna Vanessa Nuñez
8 is serving as first-chair in a jury trial that commences Friday February 23, 2018, and runs
9 through March 9, 2018, at the earliest. The case is *Kanellakopoulos v. Unimerica Life Insurance*
10 Co., No. 15-cv-4674-BLF, proceeding before the Honorable District Judge Beth Freeman
11 in San Jose.

12 (3) Because of the time demands of the trial and trial preparation, it will not be
13 feasible for counsel to Adriana Vanessa Nuñez to generate a fee petition by the March 5,
14 2018 date currently prescribed by the Court's Order (Dkt. 67).

15 (5) There are no prior requests by the parties to enlarge time.

16 (6) Granting the instant Stipulation to enlarge the due date for a fee petition will
17 not affect any other date currently prescribed by the Court.

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1 WHEREFORE, the undersigned hereby stipulate and agree that the deadline for
2 Interpleader Defendant Adrianna Vanessa Nuñez to file a fee petition, currently
3 prescribed by the Court's Order of February 12, 2018 (Dkt. 67) shall be enlarged by
4 twenty-one days, to and including March 26, 2018.

5 Dated: February 20, 2018

CREITZ & SEREBIN LLP

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7 By: /s/ Joseph A. Creitz
8 Attorneys for Interpleader Defendant
ADRIANA VANESSA NUÑEZ

9 Dated: February 20, 2018

IBARRA PROFESSIONAL LAW
CORPORATION

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11 By: /s/ Gener Benitez
12 Gener Benitez
13 Attorneys for Plaintiff and Interpleader
Defendant GLORIA NUÑEZ

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19 SIGNATURE ATTESTATION

20 I hereby attest that I obtained the consent of all signatories hereto to the filing of
21 this document.

22 Dated: February 20, 2018

CREITZ & SEREBIN LLP

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24 By: /s/ Joseph A. Creitz
25 Attorneys for Interpleader Defendant
ADRIANA VANESSA NUÑEZ

[proposed] ORDER

Pursuant to the stipulation of the parties, and good cause appearing, the deadline for Interpleader Defendant Adrianna Vanessa Nuñez to file a fee petition, if any, shall be enlarged by twenty-one days, to and including March 26, 2018.

| IT IS SO ORDERED

Dated: February 21, 2018

UNITED STATES DISTRICT JUDGE